

Morgan Lewis

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January 16, 2020

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 1/17/2020

The pre-trial conference is adjourned to March 13, 2020 at 11:30 a.m. The parties shall submit their joint letter and proposed case management plan no later than March 6, 2020.

BY ECF ONLY

The Honorable Vernon S. Broderick, U.S.D.J.
United States District Judge, Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 415
New York, New York 10007

Re: *Terence Lewis v. Saks & Company LLC*, Case No. 1:19-cv-07765 (VSB)

Dear Judge Broderick:

We represent Defendants Saks & Company LLC, Sarah Griffiths-Neige, Kelly Karakul, and Brian Ziegler (collectively, "Defendants") in the above-referenced matter. We submit this letter-motion, pursuant to Your Honor's Individual Rule 1(G), to respectfully request an adjournment of the February 6, 2020 initial conference (and accompanying deadline to submit a joint letter and proposed case management plan by January 31, 2020).

Defense counsel respectfully requests an adjournment of the initial conference because the undersigned is scheduled to attend a mediation in Buffalo, New York on February 6, 2020 for another case pending before Hon. Judge Geoffrey W. Crawford in the United States District Court for the Western District of New York (Case No. 19-cv-00077). Additionally, defense counsel is preparing for a jury trial before Hon. Judge Edgardo Ramos, which is scheduled for the week of February 24-28, 2020 (S.D.N.Y. Case No. 15-cv-09598).

Counsel for the parties have conferred and are available on the following alternative dates for the initial conference: March 9, 11, 12, 13, or at another date most convenient for the Court. Counsel is also available to participate in the initial conference by telephone if amenable to the Court.

Accordingly, we respectfully request that the Court adjourn the February 6 initial conference and deadline to submit a joint letter and proposed case management plan. This is Defendants' first request for an adjournment of the initial conference and, as noted, Plaintiff's counsel consents to this request and the proposed alternative dates.

Thank you for Your Honor's consideration.

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Respectfully submitted,

/s/ Chelsea L. Conanan

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Counsel for Defendants

cc: All counsel of record by ECF